

COHEN & GREEN

October 8, 2020

Hon. Victor Marrero, U.S.D.J.
United States District Court
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007

By Electronic Filing.

Re: Jones et al. v. United States Postal Service, 20-cv-6516-VM

Dear Judge Marrero:

I write regarding Defendants' filings early this morning, regarding the Court's direction to meet and confer by yesterday. Rather than meeting and conferring, Defendants apparently prepared a lengthy letter brief. Given the Court's directions, we do not believe that filing any legal arguments on this topic is appropriate, and will not unless the Court directs us to.

However, I feel it is important to note that the redline attached to Defendants' filing does not indicate areas of disagreement. Instead, it compares Defendants' initial draft to their current draft, leaving out our proposed changes entirely (except where Defendants have accepted a modified version of the change). While I do not have a copy of the Word file that would allow me to produce a clean redline, I have used software to create and attach the cleanest version I can of an appropriate redline (e.g., comparing Defendants' changes to our proposal to our actual proposal). When I noticed this, I asked Defendants to file an appropriate redline, to which they responded they would "file that this morning," but have not done so.

Given the number of things pending, we believe a conference on all issues would be extremely helpful – and given the amount of time that has passed here, is somewhat urgent. As always, we thank the Court for its time and attention.

Respectfully submitted,

/s/

J. Remy Green

Honorific/Pronouns: Mx., they/their/them

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All relevant parties by ECF and email.